

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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WILLIAM HENIG, on behalf of himself and INDEX NO: 13 CV 1432
all others similarly situated,

Plaintiff,

v.

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP and PROVIDUS
NEW YORK, LLC,**

Defendants.

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DECLARATION OF DENISE A. SCHULMAN

I, Denise A. Schulman, under penalty of perjury, affirm as follows:

1. My name is Denise A. Schulman, and I am an associate with Joseph & Kirschenbaum LLP (“JK”), Plaintiff’s counsel in the above-captioned matter. I am familiar with the facts and circumstances set forth herein.

2. I submit this declaration in opposition to Defendant Quinn Emanuel Urquhart & Sullivan, LLP’s (“Quinn Emanuel”) motion for summary judgment.

3. As set forth in the August 14, 2015 declaration of Samuel C. Kitchens, Quinn Emanuel produced in this litigation the Relativity Spreadsheet (bearing Bates number QE00210824), which lists the documents Plaintiff reviewed and actions he performed with respect to those documents, including the tags he applied to each.

4. The tags are represented in the Relativity Spreadsheet by Artifact ID numbers listed in the “Details” column. The Code Spreadsheets Quinn Emanuel produced in this litigation (bearing Bates numbers QE00216086-216089) indicate which Artifact ID number corresponds to which tag.

5. Based on the Artifact ID numbers in the Relativity Spreadsheet, Plaintiff marked just one document as “key.”

6. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the July 3, 2014 deposition of Plaintiff William Henig.

7. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the September 9, 2014 deposition of Andrew Kutscher as Quinn Emanuel’s witness pursuant to Fed. R. Civ. P. 30(b)(6).

8. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the July 10, 2014 deposition of Todd Riegler.

9. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the July 18, 2014 deposition of Michael Belgraiier.

10. Attached hereto as Exhibit 5 is a true and correct copy of Exhibit 12 from the July 3, 2014 deposition of William Henig, which is a document reviewed by Plaintiff in his work for Defendants and produced by Quinn Emanuel in this litigation bearing Bates numbers QE00000540-41.

11. Attached hereto as Exhibit 6 is a true and correct copy of Exhibit 13 from the July 3, 2014 deposition of William Henig, which is a document reviewed by Plaintiff in his work for Defendants and produced by Quinn Emanuel in this litigation bearing Bates numbers QE00000782-85.

12. Attached hereto as Exhibit 7 is a true and correct copy of relevant excerpts from Quinn Emanuel’s supplemental objections and responses to Plaintiff’s first set of interrogatories.

13. Attached hereto as Exhibit 8 is a true and correct copy of relevant excerpts from Quinn Emanuel's second supplemental objections and responses to Plaintiff's first set of interrogatories.

14. Attached hereto as Exhibit 9 is a true and correct copy of an e-mail chain produced by Quinn Emanuel in this litigation bearing Bates numbers QE00211982-984 and which was marked as Exhibit 12 at the July 10, 2014 deposition of Todd Riegler.

15. Attached hereto as Exhibit 10 is a true and correct copy of an e-mail chain produced by Quinn Emanuel in this litigation bearing Bates numbers QE00216009-216015 and which was marked as Exhibit 1 at the July 10, 2014 deposition of Todd Riegler.

16. Attached hereto as Exhibit 11 is a true and correct copy of an e-mail chain produced by Quinn Emanuel in this litigation bearing Bates numbers QE00215997-999.

17. Attached hereto as Exhibit 12 is a true and correct copy of an August 31, 2012 e-mail produced by Quinn Emanuel in this litigation bearing Bates numbers QE00215983-984.

18. Attached hereto as Exhibit 13 is a true and correct copy of notes taken by a First Level Reviewer who worked on same Document Review Project as Plaintiff that were produced by Quinn Emanuel in this litigation and marked as Exhibit 9 to the September 9, 2014 deposition of Andrew Kutscher.

19. Attached hereto as Exhibit 14 is a true and correct copy of notes taken by another First Level Reviewer who worked on same Document Review Project as Plaintiff that were produced by Quinn Emanuel in this litigation and marked as Exhibit 10 to the September 9, 2014 deposition of Andrew Kutscher.

20. Attached hereto as Exhibit 15 is a true and correct copy of notes taken by another First Level Reviewer who worked on same Document Review Project as Plaintiff that were

produced by Quinn Emanuel in this litigation and marked as Exhibit 11 to the September 9, 2014 deposition of Andrew Kutscher.

21. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the bill for services rendered in August 2012 sent from Quinn Emanuel to its client and produced by Quinn Emanuel in this litigation. Additional excerpts from this bill were submitted by Quinn Emanuel as Exhibit M to the August 14, 2015 declaration of Samuel C. Kitchens.

22. Attached hereto as Exhibit 17 is a true and correct copy of excerpts from the bill for services rendered in September 2012 sent from Quinn Emanuel to its client and produced by Quinn Emanuel in this litigation. Additional excerpts from this bill were submitted by Quinn Emanuel as Exhibit N to the August 14, 2015 declaration of Samuel C. Kitchens.

23. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the bill for services rendered in October 2012 sent from Quinn Emanuel to its client and produced by Quinn Emanuel in this litigation. Additional excerpts from this bill were submitted by Quinn Emanuel as Exhibit O to the August 14, 2015 declaration of Samuel C. Kitchens.

24. Attached hereto as Exhibit 19 is a true and correct copy of N.Y. State Bar Ass'n Comm. on Prof'l Ethics, Opinion 304 (Oct. 17, 1973).

25. Attached hereto as Exhibit 20 is a true and correct copy of N.Y. State Bar Ass'n Comm. on Prof'l Ethics, Opinion 677 (Dec. 12, 1995).

26. Attached hereto as Exhibit 21 is a true and correct copy of N.Y. State Bar Ass'n Comm. on Prof'l Ethics, Opinion 898 (Dec. 19, 2011).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
September 21, 2015

/s/ Denise A. Schulman
Denise A. Schulman